

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

In re CASSAVA SCIENCES, INC.	§	
SECURITIES LITIGATION	§	Master File No. 1:21-cv-00751-DAE
	§	
	§	CLASS ACTION
This Document Relates To:	§	
	§	
ALL ACTIONS	§	
	§	
	§	

**AFFIDAVIT OF KEVIN A. LAVELLE IN SUPPORT OF PLAINTIFFS' REPLY IN
FURTHER SUPPORT OF MOTION FOR CLASS CERTIFICATION**

I, Kevin A. Lavelle, declare, under penalty of perjury:

1. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, the State Bar of California, am admitted *pro hac vice* to the above-referenced action, and am lead counsel for lead plaintiff Mohammad Bozorgi. I submit this affidavit in support of Plaintiffs' Reply in Further Support of Motion for Class Certification.

2. Attached is a true and correct copy of the following exhibits:

- Exhibit 1: *United States v. Wang*, 24-cr-211, ECF 1 (D. Md. June 27, 2024);
- Exhibit 2: Press Release, Cassava Sciences, Inc., *Cassava Sciences Announces Changes in Executive Leadership, Enhanced Corporate Governance and Other Initiatives* (July 17, 2024), <https://www.cassavasciences.com/node/17061/pdf>;
- Exhibit 3: Cassava Sciences, Inc., Current Report (Form 8-K) (July 1, 2024);
- Exhibit 4: Excerpts from August 8, 2024 Deposition Transcript of René M. Stulz, Ph.D.;
- Exhibit 5: Rebuttal Report of Professor Steven P. Feinstein, Ph.D., CFA August 23, 2024;
- Exhibit 6: Press Release, Cassava Sciences, Inc., *Cassava Sciences Announces Final Results of a Phase 2b Clinical Study of Sumifilam in Patients with Alzheimer's Disease* (Sept. 14, 2020), <https://www.cassavasciences.com/node/14916/pdf>;
- Exhibit 7: Press Release, Cassava Sciences, Inc., *Cassava Sciences Announces Additional Clinical Data from a Phase 2b Study of Sumifilam in Alzheimer's Disease* (Nov. 4, 2020), <https://www.cassavasciences.com/node/14971/pdf>;
- Exhibit 8: Press Release, Cassava Sciences, Inc., *Cassava Sciences Announces Significant Program Progress and Expected Key Milestones in 2021 for Its Clinical Program in Alzheimer's Disease* (Feb. 8, 2021), <https://www.cassavasciences.com/node/15121/pdf>;
- Exhibit 9: Press Release, Cassava Sciences, Inc., *Cassava Sciences Announces Positive End-of-Phase 2 Meeting with FDA and Outlines Pivotal Phase 3 Program for Simufilam in Alzheimer's Disease* (Feb. 22, 2021), <https://www.cassavasciences.com/node/15186/pdf>;
- Exhibit 10: *Bozorgi v. Cassava Scis., Inc.*, 1:24-MC-91041-AK, Sealed and Unredacted Version of ECF 20, (D. Mass. Feb. 22, 2024) [FILED UNDER SEAL];

- Exhibit 11: August 28, 2021 email from Heidi Creighton to Kevin Hrusovksy RE Cease and Desist Request [BEGNO.: Quanterix_Cassava_Sec_Litig_0003303] [FILED UNDER SEAL];
- Exhibit 12: Chart of Post-Comcast Cases Where Dr. Feinstein's Out-of-Pocket Damages Methodology Was Adopted at the Class Certification Stage;
- Exhibit 13: Excerpts from May 17, 2024 Deposition Transcript of Mohammad Bozorgi;
- Exhibit 14: Excerpts from May 9, 2024 Deposition Transcript of Kenneth Calderone;
- Exhibit 15: Excerpts from May 28, 2024 Deposition Transcript of Manohar K. Rao.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 23, 2024.

/s/ Kevin A. Lavelle

KEVIN A. LAVELLE